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8 Attorney for Plaintiffs
9 AMERICAN PRESIDENT LINES, LTD. and
10 APL CO. Pte., LTD.

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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

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15 APL CO. Pte., LTD, a corporation, and
16 AMERICAN PRESIDENT LINES, LTD., a
17 corporation,

18 Plaintiffs,
19 v.

20 EXPORT INTERNATIONAL, INC., a
21 corporation,

22 Defendant.

No. C 12-4459 EMC

**SECOND STIPULATED MOTION TO
EXTEND THE TIME TO RESPOND
TO THE COMPLAINT**

23 Pursuant to Civil Local Rule 6-2, plaintiffs American President Lines, Ltd. and APL Co.
24 Pte., Ltd. (collectively “APL”) and defendant Export International, Inc. (“EI”) request an order
25 extending the time for EI to file an appearance in this matter.

26 One previous time modification regarding EI’s appearance deadline has been requested
27 and granted. The parties have concurrently filed a Second Stipulated Request for Order Granting
28 Relief from Case Management Schedule.

29 This second request to extend EI’s appearance deadline is sought to allow APL and EI
30 time to finalize a settlement agreement. The parties have agreed on the amount of a settlement
31 payment from EI to APL. However, a term of the proposed settlement involves APL entering

1 into a shipping contract with EI. An enlargement of the time for the Case Management Schedule
2 will allow the parties to negotiate the terms of that contract and complete the settlement. (See
3 Declaration of Mark K. de Langis, filed in support of this Second Stipulated Motion.)

4 IT IS HEREBY STIPULATED by and between plaintiff APL and defendant EI that EI's
5 appearance deadline be extended to February 1, 2013.

6 DATED: January 17, 2013

7 LUCAS VALLEY LAW

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9 By: /s/ Mark K. de Langis

10 Mark K. de Langis
11 Attorneys for Plaintiffs
12 AMERICAN PRESIDENT LINES, LTD.
13 APL Co., Ltd.

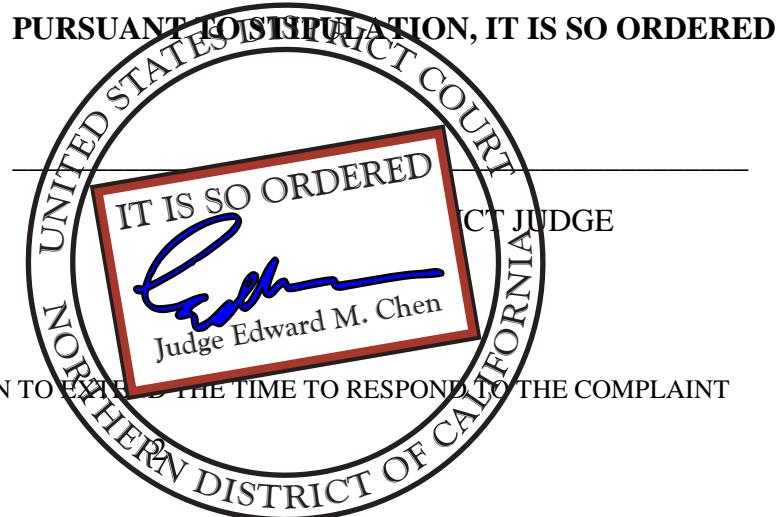
14 DATED: January 17, 2013

15 HELTZEL, WILLIAMS, YANDELL, ROTH,
16 SMITH, PETERSEN & LUSH, P.C.

17 By: /s/ Michael C. Petersen

18 Michael C. Petersen
19 Attorneys for Defendant
20 EXPORT INTERNATIONAL, INC.

21 Dated: 1/24/13



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26 SECOND STIPULATED MOTION TO EXTER THE TIME TO RESPOND TO THE COMPLAINT

1 **ATTESTATION PURSUANT TO CIVIL L.R. 5.1**

2 I, Mark K. de Langis, attest that I have on file all holographic signatures corresponding to
3 any signatures indicated by a conformed signature (/s/) within this e-filed document.

4

5 _____/s/ Mark K. de Langis_____

6 Mark K. de Langis

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SECOND STIPULATED MOTION TO EXTEND THE TIME TO RESPOND TO THE COMPLAINT